

REMARKS

Claims 7-21, 32-40, 42 and 45-49 are still pending in this application. The examiner is thanked for the telephone interview held September 4th, 2009 with the undersigned. During the interview the *Cook* and *Linehan* references were discussed.

Rejection under Section 103

Claims 7-21 and 32-46 have been rejected under 35 USC §103 as being unpatentable over *Cook* in view of *Otto et al.* and *Linehan*.

Each of the independent claims has been amended to require “said method not requiring use of any additional software on said computer of said customer.” The background of the application at page 2, lines 12-21 discusses that prior art systems had complex designs, required significant investment by system participants, and required use of burdensome software certificates by cardholders. The advantage of “no additional software being required on the customer computer” means that the customer does not need to purchase, maintain, understand or use extra software related to the claimed authentication method. This embodiment in which no additional software is required is supported, for example, at: page 3, first paragraph; page 9, lines 15-16; page 10, lines 24-27; page 14, lines 12-13; and page 23, lines 2-4.

No *Prima Facie* Obviousness

None of the cited references disclose request and response messages being routed through the customer computer in which no additional software is required on the customer computer, as now specifically required by the amended independent claims. *Cook* might not require additional software on customer computer 14 (Figure 1), but its messages between the merchant 16 and the authorization system 18 are not routed via the customer computer. *Linehan* discloses messages passed between the merchant 204 and the issuing bank 212 via the consumer computer 202 (Figure 2A), but does require extra consumer “wallet” software on the customer computer as explained below.

Therefore, because this limitation is not present in any of the cited references, it is requested that the rejection be withdrawn.

Not Obvious to Combine *Cook* and *Linehan*

Cook does not disclose routing request and response messages via the customer computer as required by the independent claims and as discussed in the previous Reply. *Linehan* is cited as disclosing the routing of request and response messages via the consumer computer 202. But, the only way *Linehan* can do this is through the mandatory use of burdensome consumer wallet software. If *Linehan* is combined with *Cook*, the resulting system must use additional wallet software on the customer computer as required by *Linehan*. By contrast, the presently claimed invention not only routes messages through the customer computer, but also does so without requiring the use of any additional software.

Linehan discloses that use of its consumer wallet software is mandatory at the following locations: Figure 2A; steps 306 and 814; first full paragraph of column 4; column 5, lines 8-10; discussion of Figure 2A in column 5; column 7, lines 14-17 and 55-65; column 9, lines 40-45; and, column 13, lines 30-45. In particular, column 10, lines 13-26 reveal that the consumer wallet must be used. Finally, variations in the protocol are discussed in column 14 but there is no mention of not using additional consumer wallet software.

For these reasons, combining the above two references would not lead to the presently claimed invention and it is requested that the rejection be withdrawn.

Claims 42 and 47-49

These claims require redirection of the Internet browser of the customer computer and have not been specifically rejected. None of the cited references disclose redirecting the customer's browser in order to switch between the merchant computer and the issuer computer.

Reconsideration of this application and issuance of a Notice of Allowance at an early date are respectfully requested. If the Examiner believes a telephone conference would in any way expedite prosecution, please do not hesitate to telephone the undersigned at (612) 252-3330.

Respectfully submitted,
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